

FS-00534
Amendment dated 12/20/2005

09/916,516
Reply to office action mailed 10/17/2005

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REMARKS

Claims 1-13 are currently pending in the application. Claim 1 is amended for the Examiner's consideration. The foregoing separate sheets marked as "Listing of Claims" shows all the claims in the application, with an indication of the current status of each.

The Examiner's withdrawal of the prior §102(e) rejection based on U.S. Patent No. 6,591,272 to Williams is acknowledged with appreciation

The Examiner rejects claims 1-13 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent Application Publication 2002/0016954 to Charisius et al. ("Charisius"). Charisius provides a software tool for simultaneous display of graphical and textual views of a database, the views being synchronized so that modifications in one view are automatically reflected in the other view (page 1, para 0011). However, the problem with applying this method to the present invention is that Charisius presumes a symmetry that does not exist in the connection between the source database and the target application of the present invention. In summary, this means that Charisius suffers from the same defect as Williams: there is no direct translation to the target application.

It will be helpful to briefly review the problem addressed by the present invention. The problem begins with the target application, which makes use of data contained in tables of a database. The goal is to be able to make changes in the target application, and know that these changes will work at run time. In the prior art, such changes in the target application would be methodically traced through to the database, but this was an error prone procedure. Furthermore, the errors did not become apparent until run time. The approach of the invention is to reverse the process and work from the database instead of from the target application. Similarly, where there are changes in the database, the solution of the present invention is to perform an automated process that also works from the database.

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In considering a) whether Charisius does what the invention does, and if so b) whether Charisius uses a method that is substantially different, a preliminary question is what Charisius purports to do, and then how Charisius does what it purports to do. The symmetry of the software tool developed by Charisius has been noted. But underneath the symmetrical synchronization asserted in paragraph 0099, what does Charisius attempt to do and how does Charisius operate?

It will be observed that Charisius is concerned with synchronizing source code with a modeling language for representing the source code. In comparable terms, the present invention is concerned with coordination between a database and a target application which uses data in the database. With Charisius, the two sides of the synchronized relationship are simply different representations of the same thing, namely, the source code. On one side is a graphical representation of the source code and on the other side is the text representation. There is a translation between the two representations, and the translation works in both directions. Compare, for example, Fig. 29 (which begins with an update to the model side) and Fig. 36 (which begins with an update to the source code side). What Charisius describes is a bidirectional translation method between graphical and textual representations of source code. In order to accomplish these symmetrical translation tasks Charisius generates a transient meta model (TMM) “which stores a language neutral representation of the source code”. This TMM is then used to generate both the graphical and textual representations (page 3, para 0059). This reliance upon a neutral intermediate representation is reminiscent of the intermediate structure described in the earlier Williams reference. The present invention has no such intermediate structure or representation.

The present invention, by contrast, takes an asymmetrical approach, always beginning the solution from the database side. Charisius achieves methodological symmetry by using the intermediate TMM, which has no counterpart in the present invention. In the present invention, the two sides of the “synchronized” relationship a

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target application and database tables containing data operated on by the target application. The software development tool described in Charisius deals more narrowly with the “beans”, and in particular with the different graphical and textual representations of the bean source code. Furthermore, the operation of the two inventions is fundamentally different. Because the two sides in Charisius are merely different representations of the same thing, it is feasible for Charisius to adopt a bidirectional translation approach, using an intermediate structure. But for the present invention experience has shown that an efficient automation – without such an intermediate structure – works in only one direction, from database to target application. The solution provided by the present invention uses this same direction, regardless of whether the database or the target application has been updated.

This distinction has been clarified by the present amendment, which adds an appropriate wherein clause to the independent claim.

In view of the foregoing, it is requested that the application be reconsidered, that claims 1-13 be allowed, and that the application be passed to issue.

Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at 703-787-9400 (fax: 703-787-7557; email: clyde@wcc-ip.com) to discuss any other changes deemed necessary in a telephonic or personal interview.

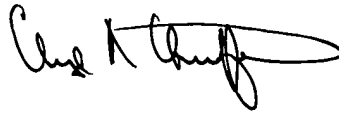
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If an extension of time is required for this response to be considered as being timely filed, a conditional petition is hereby made for such extension of time. Please charge any deficiencies in fees and credit any overpayment of fees to Attorney's Deposit Account No. 50-2041.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Clyde R Christofferson', with a stylized, flowing script.

Clyde R Christofferson
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